

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

ROBERT LEONARD KIESER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 5:20-cv-06045-NKL
	)	
C. R. BARD, INC. and BARD	)	
PERIPHERAL VASCULAR, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS’ MOTION TO STRIKE  
THE EXPERT REPORT OF J. LAWRENCE STEVENS, RAC.**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard” or “Defendants”), pursuant to Local Rule 7.0(c)(1), file this Motion to Strike the Expert Report of J. Lawrence Stevens, RAC (“Mr. Stevens”), accompanied by Bard’s separately-filed Suggestions in Support, and respectfully move this Court to strike the general opinions constituting the expert report of Plaintiff’s retained “case-specific” expert Mr. Stevens.<sup>1</sup> This Motion is based upon all matters of record in this case, including the relevant facts, applicable law, and exhibits appended to the Supporting Suggestions being filed contemporaneously herewith, and the Court’s inherent power to control its docket.

---

<sup>1</sup> To the extent this Court does not strike Mr. Steven’s expert report, or any portions thereof, Bard respectfully requests leave of court and fourteen (14) days from the date this Court issues its ruling to serve expert reports to rebut any statements, opinions, and/or conclusions offered by Mr. Stevens that remain without prejudice to and/or without waiver of its positions that: (i) generally, that general discovery was completed and closed in the MDL and (ii) specifically, that Mr. Stevens’ expert report is needlessly cumulative such that any probative value is substantially outweighed by the unfair prejudice to Bard.

Dated: January 19, 2021

Respectfully submitted,

/s/ Kara T. Stubbs

Kara T. Stubbs MO #43414  
BAKER STERCHI COWDEN & RICE LLC  
2400 Pershing Road, Suite 500  
Kansas City, MO 64108  
Telephone: (816) 471-2121  
Facsimile: (816) 472-0288  
stubbs@bscr-law.com

Lori G. Cohen (Admitted *pro hac vice*)  
GREENBERG TRAURIG LLP  
Terminus 200  
3333 Piedmont Road, N.E., Suite 2500  
Atlanta, GA 30305  
Telephone: (678) 553-2100  
cohenl@gtlaw.com

Enjoliqué Aytch Lett (Admitted *pro hac vice*)  
GREENBERG TRAURIG LLP  
333 S.E. 2nd Avenue  
Miami, FL 33131  
Telephone: (305) 579-0640  
lette@gtlaw.com

**ATTORNEYS FOR DEFENDANTS**  
**C. R. BARD, INC. and BARD**  
**PERIPHERAL VASCULAR, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was filed with the Clerk of the Court using the CM/ECF system on this 19<sup>th</sup> day of January, 2021, which will send notification of the same to all counsel of record.

/s/ Kara T. Stubbs